

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

EASTERN PROFIT CORPORATION LIMITED,

Plaintiff/Counterclaim Defendant,

Case No. 18-cv-2185

v.

STRATEGIC VISION US, LLC,

Defendant/Counterclaim Plaintiff.

**DEFENDANT/COUNTERCLAIMANT'S MOTION FOR LEAVE
TO FILE UNDER SEAL**

Defendant/Counterclaimant Strategic Vision US, LLC ("Strategic Vision"), pursuant to Section 15(a) of the Stipulated Protective Order Governing Designation and Disclosure of Confidential Information, ECF 40 ("Protective Order"), seeks leave to file under seal two letter motions being submitted in the above-captioned action pursuant to Rule 1(F) of the Court's Individual Practices Rules. Both letter motions describe testimony from a deposition taken on August 2, 2019 of non-party witness Guo Wengui, a/k/a Miles Guo, a/k/a Miles Kwok ("Guo"). Guo has requested that the testimony be treated as confidential under the Protective Order, which itself treats the testimony as confidential for 21 days after the official transcript has been prepared pursuant to Section 5(a) of the Protective Order. The official transcript has not yet been prepared as of the date of this motion. One of the letter motions also quotes from testimony by Yvette Wang, who provided Fed. R. Civ. P. 30(b)(6) testimony for Plaintiff Eastern Profit Corporation Limited on January 31, 2019. Ms. Wang's deposition has been designated as confidential under the Protective Order.

In accordance with the Protective Order, Strategic Vision therefore seeks leave to submit the two letter motions under seal.

Dated: August 6, 2019

Respectfully submitted,

GRAVES GARRETT LLC

s/ Edward D. Greim

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ATTORNEY FOR DEFENDANT/COUNTERCLAIM
PLAINTIFF

CERTIFICATE OF SERVICE

This certifies that the foregoing was served via the Court's Electronic Case Filing System on the date of filing, August 6, 2019, to all counsel of record.

s/ Edward D. Greim

Attorneys for Defendant/Counterclaim Plaintiff